Remarks

Claims 1-22 were presented for prosecution and remain pending. Claims 1, 2, 8, 9, 11, 15, 16 and 17 were rejected under 35 USC 103(a) as allegedly being unpatentable over Simonoff (US Patent 6,195,453) in view of Kruppa (US Patent 6,243,504). Claim 21 was rejected under 35 USC 103(a) as allegedly being unpatentable over Kruppa in view of Simonoff. Claims 3, 4, 6, 7, 10, 13, 14, 19, 20 and 22 were rejected under 35 USC 103(a) as allegedly being unpatentable over Simonoff and Kruppa in further view of Higgins et al. (US Patent 5,091,968). Claims 12 and 18 were rejected under 35 USC 103(a) as allegedly being unpatentable over Simonoff and Kruppa in further view of Tateishi (US Publication 2003/0059099). Claims 1, 8 and 15 have been amended. No new matter is believed added.

Applicants respectfully submit that all claims are allowable over the cited art. "To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations." MPEP 706.02(j).

Applicants respectfully submit that the prior art fails to teach or suggest all of the claim limitations. For instance, claim 1 (and similarly claim 8) recites, *inter alia*, "a conversion system for converting the character data to a Magnetic Ink Character Recognition (MICR) format from a non-MICR format." In the Office Action, it is alleged that Simonoff teaches such a conversion system. In particular, it is alleged that the constructing of a "correct series of MICR code characters, a laser printer equipped with MICR magnetic toner,

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and printing in MICR character font" implies converting "optically scanned character data to a MICR format." Applicants strenuously traverse this finding.

Contrary to what is alleged in column 5, lines 13-19, Simonoff does not teach a conversion process, but instead teaches processing scanned character information that is already in a MICR format. In fact, the only processing taught in the cited section by Simonoff is to make sure that the character data is in a valid MICR format. The program "is instructed to examine the MICR numbers represented by the MICR codes between the 'routing marks' and ascertain whether these numerical MICR codes are valid," e.g., by examining the "number of digits and the location of special characters." Nowhere does Simonoff teach or suggest converting the scanned data from a non-MICR format to a MICR format.

As is clearly disclosed, Simonoff teaches a process in which the scanned MICR codes are first identified using an OCR process (e.g., see claim 1). Once they are identified, they are validated (claim 3) and then regenerated, i.e., printed using stored MICR fonts (claim 1). There is simply no conversion process that takes place in Simonoff. Accordingly, because none of the cited references teaches or suggests converting character data to a MICR format, and each of Applicants' claims include such a feature, Applicants submit that all claims are in condition for allowance.

Moreover, Applicants submit that there would be no motivation to combine the references as suggested for the following reasons. Simonoff teaches the initial step of using OCR to identify the MICR codes so the MICR codes can be regenerated. Accordingly, as far as Simonoff is concerned, the codes have already been identified or recognized using OCR before the printing takes place. Thus, since the codes are already known, one skilled in the

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art would have no motivation to convert the data into a MICR format in order to perform MICR based character recognition, as is claimed by Applicants. In other words, Simonoff uses OCR to perform character recognition so there would be no motivation to use MICR based character recognition. Applicants' invention addresses the fact that using OCR in the manner taught by Simonoff is not reliable. So instead, Applicants convert the scanned data to a MICR format, and then perform a character recognition process. This inventive concept is neither taught, nor suggested in any of the references. Accordingly, one skilled in the art could not possibly arrive at the present invention based on the cited references. Therefore, Applicants submit that the claims are not obvious in view of the cited art.

Applicants respectfully submit that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

Dated: 6/6/05

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